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June 17, 1993

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JUN 17 1993

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 93-116
Amendment of Part 22
of the Commission's Rules
Comments of PagePrompt U.S.A.

Dear Ms. Searcy:

On behalf of PagePrompt U.S.A., we hereby submit an original and four copies of its Comments in the above-referenced rule making proceeding.

Please direct any questions or correspondence concerning

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Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

JUN 17 1993

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In the Matter of)
)
 Amendment of Part 22 of the)
 Commission's Rules Pertaining to)
 Power Limits for Paging Stations)
 Operating in the 931 MHz Band)
 in the Public Land Mobile Service)

CC Docket No. 93-116
 RM No. _____

TO: The Commission

COMMENTS OF PAGEPROMPT U.S.A.

PagePrompt U.S.A. ("PagePrompt"), by counsel and pursuant to Section 1.415(b) of the Commission's Rules, hereby submits its Comments in the above-captioned rule making proceeding, which was announced in the Commission's Notice of Proposed Rule Making ("NPRM"), 8 FCC Rcd 2796 (1993). Through these Comments, the following is stated:

1. PagePrompt is the Part 22 permittee and/or licensee of numerous PLMS stations^{1/}, through which it is providing, or is authorized to complete construction and provide, wide-area, one-way common carrier paging service on frequencies 931.1375 MHz, 931.2875 MHz and 931.5625 MHz. PagePrompt has authorized facilities in California, Nevada, Arizona, New Mexico, Colorado, Wyoming, Minnesota, Idaho, Oregon, Washington, Utah, Nebraska, Oklahoma, Texas, Louisiana, Missouri, Tennessee,

^{1/} PLMS stations currently authorized to PagePrompt are KNKI691, KNKM688, KNKM824, KNKM841, KNKM968, KNKM994, KNKO203, KNKO310, KNKO378, KNKO607, KNKO625, KNKO626, KNKO668, KNKO685.

Kentucky and Indiana. PagePrompt also has pending applications for additional base stations in some of those states, as well as applications for new 931 MHz facilities in several more states. PagePrompt currently serves approximately 35,000 subscriber units on its 931 MHz systems.

2. PagePrompt is in favor of the proposed rule changes under Part 22 to allow operation of all transmitters in the 931 MHz band up to a maximum of 3,500 watts effective radiated power ("ERP"). The potential benefits of the power increase mentioned in ¶ 6 of the NPRM would be realized by carriers such as PagePrompt which are still in the process of expanding and improving their wide-area, or even regional, systems.

3. A fewer number of transmitters would be able to provide coverage to the same geographic area. This not only translates into the obvious reduction in equipment and related construction costs, and operational costs such as site rental and maintenance, but also, to some extent, savings in the costs associated with application preparation and filing. The rule changes would also contribute to greater administrative efficiencies, in that the Mobile Services Division staff would have fewer applications to process.

4. Paging subscribers would also benefit from the reduced costs and greater flexibility of the licensee. Even more importantly, the quality of service would improve under certain circumstances. In addition to providing better building penetration, higher power transmitters would permit carriers to

keep pace with advancing technology and more effectively integrate with new equipment as it enters the marketplace.

5. For example, a pager on a system operating with a high BAUD rate can better receive its intended signal if the signal is transmitted from a higher power transmitter. The "BAUD" rate of a system is the industry's method of rating the speed by which the pager receives a signal; the higher the BAUD rate of a system, the faster the signal is received. Also, the higher the BAUD rate of a system, the more paging subscribers can be served by the system because the paging signals are received faster. However, a system with a high BAUD rate will need to utilize a greater number of transmitters in order to transmit paging signals strong enough to be received by the pagers. With transmitters operating at higher power, as proposed in this proceeding, the carrier would not have to use as many transmitters.

6. The economic benefits of the carrier using fewer transmitters and accommodating more paging subscribers on the system would be passed on to the public. Moreover, any resulting reduction in subscriber rates and improved service would allow carriers operating in the 931 MHz band to be more competitive with other carriers in the market, which is in the public interest.

7. PagePrompt respectfully requests that, in the Report & Order adopting the rule changes, the Commission address certain procedural matters, such as whether applicants which have 931

MHz applications pending at the time the Report & Order becomes effective may amend their applications to specify a higher ERP (and, therefore, a larger reliable service area), without those applications being considered newly filed.

CONCLUSION

Accordingly, PagePrompt U.S.A. respectfully supports the Commission's proposed amendments to the Part 22 Rules.

Respectfully submitted,

PAGEPROMPT U.S.A.

By: *Louise Cybulski*
Ellen S. Mandell
Louise Cybulski

Its Attorneys

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June 17, 1993

CERTIFICATE OF SERVICE

I, Tracey S. Westbrook, a secretary with the law firm Pepper & Corazzini, do certify that on this 17th day of June, 1993, I served copies of the foregoing "Comments of PagePrompt U.S.A." by hand upon the following:

Kathleen B. Levitz
Acting Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Room 500
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John Cimko, Jr.
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Tracey Westbrook